

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES, 2006

Docket No. R2006-1

OBJECTION OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES DBP/USPS-573-598.

In interrogatories DBP/USPS-573-598, Mr. Popkin asks a series of questions of the following form:

Please refer to your response to Interrogatory DBP/USPS-xxx. Since the Postal Service is just beginning the process of examining how to implement the changes necessary to effectuate its plans reflected in revised footnote 2 of USPS-T-38. Please respond to the original Interrogatory and advise the present status of the plans and please provide updates to the plans until either the final plans have been arrived at or the record in this Docket has been closed.

In light of issues raised by Mr. Popkin and others, the Postal Service reconsidered its plans and indicated that Bound Printed Matter, and associated special services, will continue to be available at retail. In responding to some previous interrogatories, the Postal Service indicated that the level of detailed information sought was not available, because procedures were just beginning to be developed. Mr. Popkin now seeks to "follow up" on these questions by re-asking them and asking the status of the ongoing efforts. These questions are both inappropriate follow up and are cumulative. (They are also somewhat difficult to understand, given the prevalence of incomplete and run-on sentences.) Nevertheless, the answers would be the same as the recent answers provided by the Postal Service to his previous round of questions. Furthermore, the status of the planning is not relevant to any issues before the

Commission. It is well known that proposed changes in the DMM to implement rate case proposals are published toward the end of the litigation process and final rules are published once the Governors have acted on the Commission's recommendations. Programming changes for retail terminals will not be finalized until that time as well. Moreover, the particular steps a retail associate will follow and the similar questions that Mr. Popkin re-asks are not material to issues in this case and will not be finalized for some time.

In addition, with respect to question 579, Mr. Popkin ignores the part of the previous answer that says this analysis has not been performed. That situation does not change simply by virtue of the fact that he files a "follow up" and asks again.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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